

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Wireless Telecommunications Bureau Seeks)	
Comment on AT&T Request for Waiver to Permit)	WT Docket No. 13-202
Power Spectral Density Model for 800 MHz Cellular)	
Operations in Three Florida Markets)	

**INPUT BY PALM BEACH COUNTY (FL)
TO THE AT&T REQUEST FOR WAIVER**

1. Palm Beach County is offering its input with regards to the Wireless Telecommunications docket (WTD) in the above AT&T waiver to utilize Power Spectral Density (PSD) measurements in lieu of the traditional Effective Radiated Power (ERP) measurements at its cell sites that are located in southeast Florida, including Palm Beach County.
2. Similar to the State of Florida's objection, the County is hesitant to support the AT&T waiver request due to the possible repeat of the Sprint/NEXTEL re-banding project that occurred across the United States. While the majority of the financial aspects of the Sprint/NEXTEL re-banding were paid, maintaining the operational readiness of the public safety radio system was challenging and risky, there was some loss of interoperability did occur during the transition and a substantial amount of resources were forced to be re-prioritized as a result. As such, the County does not want to be forced into a band relocation unless such a relocation is a decision of the County and its public safety communications partners.
3. The County trusts that AT&T has fully researched the differences in utilizing PSD and ERP with regards to its cellular infrastructure, but until AT&T can provide examples of testing that can be repeated without question and that the 800 MHz licensees in Southeastern Florida can be 100% protected from adjacent channel broadband interference without transferring (or creating) the financial or technical burden to a public safety agency to mitigate the impacts of AT&T's waiver; Palm Beach County will not be able to support such a request.
4. Prior to the FCC concluding its consideration of AT&T's waiver, AT&T should be required to engage, at its sole expense, an independent 3rd party evaluator (mutually agreed to by AT&T and the public safety communications system owner to conduct on-site pre and post testing at a typical location(s) to either validate AT&T's position, research and assertions or demonstrate that conditions which protect public safety communications systems can be developed.

5. For additional follow-up concerning this submittal, please contact Mr. Mark Filla, Public Safety Radio System Manager, at 561-233-0837 or by email mfilla@pbcgov.org

Respectfully submitted

A handwritten signature in blue ink that reads "Audrey Wolf".

Audrey Wolf, Director
Palm Beach County
Facilities Development & Operations

c: Interoperability Partners

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